

Law Office Of

**Joaquin Perez**

6780 Coral Way • Miami, Florida 33155  
Phone (305) 261-4000 • Fax (305) 662-4067  
[jplaw1@bellsouth.net](mailto:jplaw1@bellsouth.net)  
(Also admitted in Massachusetts and Rhode Island)

**Via ECF**

January 18, 2022

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
New York, New York 10007

Re: *United States v. Fredy Renan Najera Montoya*  
15-cr-378 (PGG-1)

Dear Judge Gardephe:

Defendant respectfully requests that the *Fatico* hearing currently scheduled for January 24, 25, 2022 be adjourned to a future date. The government does not oppose this request based upon the following concerns.

1. On January 6, 2022, Defendant received 3500 materials which included a stack of over 5,000 pages documents and several video recordings.
2. On January 11, 2022, the MDC where Mr. Najera is confined to went into a complete lockdown. Access to video and audio teleconferences are very limited.
3. According to sources, the institution is likely to remain in lockdown mode until at least the end of January 2022.
4. Because of the foregoing, the undersigned requests an adjournment of the *Fatico* as well as the sentencing hearing until sometime in April 2022.
5. The government does not oppose this request and for scheduling conflicts both sides are requesting a potential new date sometime in April 2022.

Respectfully submitted,

/s/ Joaquin Perez

JOAQUIN PEREZ, ESQ.

NYB: 52376532

6790 Coral Way

Miami, Florida 33155

Tel. (305) 261- 4000

[jplaw1@bellsouth.net](mailto:jplaw1@bellsouth.net)

**MEMO ENDORSED:**

The application is granted. The *Fatico* hearing currently scheduled for January 24, 2022 is adjourned to **April 12, 2022**.

SO ORDERED.



---

Paul G. Gardephe  
United States District Judge  
Dated: January 19, 2022

cc: [Elinor Tarlow, \(USANYS\)](#)  
[Jacob Gutwillig \(USANYS\)](#)